

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

In re CASSAVA SCIENCES, INC.  
SECURITIES LITIGATION

Master File No. 1:21-cv-00751-DAE

## CLASS ACTION

This Document Relates To:

## ALL ACTIONS

**DEFENDANTS REMI BARBIER’S AND LINDSAY BURNS’S  
ADVISORY TO MAGISTRATE JUDGE BEMPORAD**

On December 19, 2024, the Special Discovery Master, Magistrate Judge Henry J. Bemporad, ordered counsel for Defendants Remi Barbier and Dr. Lindsay Burns by January 10, 2025 to either (i) request the deposition transcripts of Mr. Barbier and Dr. Burns from the Securities and Exchange Commission (“SEC”); or (ii) inform the Court that counsel will not request such transcripts and provide the basis for the refusal to request the deposition transcripts. *See* ECF 283 and 287. Mr. Barbier and Dr. Burns respectfully submit the following in compliance with that directive.

As discussed at the December 19<sup>th</sup> conference, Mr. Barbier and Dr. Burns have concerns that by requesting and producing the SEC transcripts, Plaintiffs and/or the Court may construe such request and production as an authentication of the transcripts by Mr. Barbier and Dr. Burns, and an admission as to their admissibility and accuracy. Accordingly, Mr. Barbier and Dr. Burns respectfully request that the Court order Mr. Barbier and Dr. Burns to request and produce the SEC transcripts with the qualification that such request and production shall not be deemed an

authentication by them as to such transcripts, or an admission by them as to the admissibility or accuracy of said transcripts.

DATED: January 10, 2025

BAKER & HOSTETLER LLP  
C. SHAWN CLEVELAND  
(TX. BAR NO. 24012433)

/s/ C. Shawn Cleveland

2850 N. Harwood Street, Suite 1100  
Dallas, TX 75201  
Telephone: 214/210-1200  
scleveland@bakerlaw.com

DOUGLAS W. GREENE  
(ADMITTED *PRO HAC VICE*)  
ZACHARY R. TAYLOR  
(ADMITTED *PRO HAC VICE*)  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: 212/847-7090  
dgreene@bakerlaw.com  
ztaylor@bakerlaw.com

**Counsel for Defendants**  
**Remi Barbier and Lindsay Burns**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 10, 2025, a true and correct copy of the foregoing was served upon each attorney of record via ECF.

/s/ C. Shawn Cleveland  
C. Shawn Cleveland